

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA : INDICTMENT
:
:
- v. - : 18 Cr.
:
KAREEM GRAVES, :
a/k/a "Pook," :
RAVON WALKER, :
a/k/a "Ray," and :
VERNON WALKER :
:
Defendants. :
- - - - - X

18 CRIM 146
JUDGE KEENAN

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. From at least in or about January 2018 up to and including February 2018, in the Southern District of New York and elsewhere, KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, GRAVES, RAVON WALKER, and VERNON WALKER agreed to commit the robbery of an individual believed to be a narcotics dealer in the Bronx, New

York.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Narcotics Conspiracy)

The Grand Jury further charges:

2. From at least in or about January 2018 up to and including February 2018, in the Southern District of New York and elsewhere, KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

3. It was a part and an object of the conspiracy that KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance that KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, conspired to distribute and possess with the intent to distribute was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT THREE
(Firearms Offense)

The Grand Jury further charges:

5. On or about February 6, 2018, in the Southern District of New York and elsewhere, KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, during and in relation to a crime of violence and a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count One of this Indictment and the narcotics conspiracy charged in Count Two of this Indictment, knowingly did use and carry firearms, and in furtherance of such crimes, did possess firearms, and did aid and abet the same, to wit, GRAVES, RAVON WALKER, and VERNON WALKER, possessed and aided and abetted the possession of firearms in anticipation of committing a robbery of an individual believed to be a narcotics dealer in the Bronx, New York.

(Title 18, United States Code, Sections 924(c) and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Indictment, KAREEM GRAVES, a/k/a "Pook," RAVON WALKER, a/k/a "Ray," and VERNON WALKER, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 21, United States Code, Section

2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds personally obtained by the defendants traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

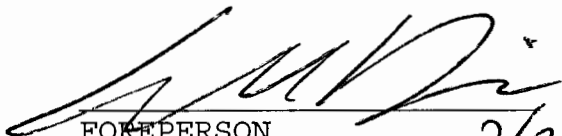
c. has been placed beyond the jurisdiction of the Court;

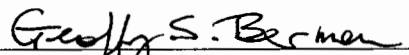
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 21, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON
2/21/18


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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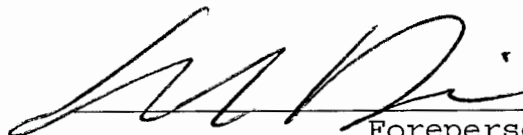
Defendants.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 924(c), 1951, and 2; 21
U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

2/21/18

2/21/18 FILED INDICTMENT. LABO ASSIGNMENT TO J. KEENAN

COTT, USM